

United States District Court

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

United States District Court
Southern District of Texas
FILED

CRIMINAL COMPLAINT

| **Mohammad Ziad ALZALAM**

Case Number: M-15- -M

YOB: 1969

SEP 18 2015

1620

COC: United States

2 **Walaa ALREHAWI**

Clerk of Court

YOB: 1988

AKA: Sanaa ALREHAWI

COC: Syria

Name and Address of Defendant

I the undersigned complainant, state the following is true and correct to the best of my knowledge and belief. On or about September 14, 2015 outside the jurisdiction of any particular State or district,

ALZALAM willfully and knowingly aided, abetted, and assisted alien Walaa ALREHAWI (female, age 27) by furnishing, disposing of, or delivering a passport to any person, for use by anyone other than the person for whose use it was originally issued and designed, and

ALREHAWI willfully and knowingly used, or attempted to use, any passport issued or designed for the use of another,

in violation of Title 18 United States Code, Section(s) 2
18 1544
 I further state that I am a(n) Customs and Border Protection Officer and that this complaint is based on the following facts:

Refer to Attachment A

Continued on the attached sheet and made a part of this complaint:

☒ Yes☐ No

OK to file. TR

Sworn to before me and subscribed in my presence,

Approved By: **T. Trevino****September 18, 2015**

Date

Dorina Ramos**U.S. Magistrate Judge**

Name and Title of Judicial Officer

Signature of Complainant

Juan R. Ciénega

Printed Name of Complainant

McAllen, Texas

City and State

Signature of Judicial Officer

Attachment A

On 09/17/2015, Defendant Mohammad ALZALAM (United States Passport no. 525342719) was apprehended at the Hidalgo, Texas Port of Entry after admitting to knowingly and willingly having used the U.S. Passport (U.S. Passport no. 505444196) of his U.S. citizen spouse, Sanaa ALREHAWI, to bring his sister-in-law, Defendant Walaa ALREHAWI, a Syrian citizen, to the United States in search of asylum. Defendant Walaa ALREHAWI arrived at the Hidalgo, Texas Port of Entry as a pedestrian seeking asylum as a Syrian citizen. Defendant Walaa ALREHAWI presented her duly issued Syrian passport and was referred into CBP Passport Control Secondary.

While Defendant Walaa ALREHAWI was being inspected, Defendant ALZALAM was referred into CBP vehicle secondary for additional inspection due to inconsistencies in his itinerary. In secondary, officers discovered female clothing included in his luggage. At that point, Defendant ALZALAM was escorted into CBP Passport Control Secondary. While being inspected, ALREHAWI was referred into CBP Passport Control Secondary due to her asylum request. Initially, both Defendant ALZALAM and Defendant Walaa ALREHAWI stated to not know each other.

During the inspection process, Defendant ALZALAM was adamant that his spouse, Sanaa ALREHAWI was in Cancun, Mexico. CBP officers were able to contact Defendant ALZALAM's spouse, Sanaa ALREHAWI, by telephone at her residence in Philadelphia, Pennsylvania. Upon being confronted with the fact that CBP Officers had contacted Sanaa ALREHAWI located in Philadelphia, Defendant ALZALAM retracted the claim that Sanaa ALREHAWI was in Cancun and admitted to the true relationship between Defendant Walaa ALREHAWI and him.

The defendant went on to state Defendant Walaa ALREHAWI is his spouse's sister, and that they were coming from Beirut. Defendant ALZALAM stated he departed the United States on 09/12/2015, in possession of Sanaa ALREHAWI's United States passport for the purpose of bringing his sister-in-law to the United States. He stated they traveled together from Beirut, Lebanon to Frankfurt, Germany, and then from Frankfurt, Germany to Cancun, Mexico, arriving in Cancun, Mexico on 09/14/2015. Defendant ALZALAM stated that Defendant Walaa ALREHAWI used Sanaa ALREHAWI's U.S. passport while traveling through Europe. Defendant ALZALAM admitted that he furnished and delivered the U.S. Passport of Sanaa ALREHAWI to Defendant Walaa ALREHAWI to facilitate her travel through Europe.

Following his arrival at the Hidalgo Port of Entry and during a routine search of his vehicle, CBP officers discovered that Defendant ALZALAM was in possession of Sanaa ALREHAWI's U.S. Passport.

Database queries proved that Defendant ALZALAM is a United States citizen who departed the United States on 09/12/2015 en route to Beirut. There exists no record of Sanaa ALREHAWI departing the United States. Database queries show that on 09/14/2015, the U.S. Passports belonging to Defendant ALZALAM (U.S. Passport no. 525342719) and Sanaa ALREHAWI (U.S. Passport no. 505444196) were used to board flights from Beirut to Frankfurt and then Frankfurt to Cancun.

Based on the aforementioned facts, probable cause exists to support the belief that a violation of Title 18 USC 1544, misuse of a passport, has been committed by ALZALAM.